

June 2, 2006

Ms. Susan Keydel
United States Environmental Protection Agency
Superfund Division
75 Hawthorne Street, SFD-7-1
San Francisco, California 94105

Re: **Draft Field Sampling Plan and Quality Assurance Project Plan
Soil Investigation for Historical Stormwater Pathway - South
Montrose Chemical Superfund Site**

Dear Ms. Keydel:

On behalf of Montrose Chemical Corporation (Montrose), Earth Tech submits four copies of the Draft Field Sampling Plan (FSP) and Quality Assurance Project Plan (QAPP) for soil investigation activities at the Historical Stormwater Pathway – South operable unit. These documents describe the scope of work, sampling procedures, analytical methods, and quality control procedures for investigation of soils within a portion of the historical stormwater pathway located at 20846 Normandie Avenue, Torrance, California. This property is owned and occupied by Ecology Control Industries, Inc. (ECI).

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Preliminary draft versions of these documents were prepared by USEPA in March 2006 and were later submitted to Montrose for its use. These plans have now been revised to reflect an alternate scope of work for investigation of soils within the historical stormwater pathway at the ECI property as previously agreed upon with USEPA. Additionally, the plans have been revised to specifically exclude investigation activities within the residential properties located adjacent to and east of the ECI property. Those residential properties are the subject of a separate FSP and QAPP being concurrently prepared by USEPA. The Data Quality Objectives (DQOs) for the soil investigation, as provided in the Draft QAPP, have been revised to eliminate the statistical justification for the previously proposed USEPA sampling grid and approach at the ECI property.

Implementation of the soil investigation activities has been tentatively scheduled to begin in July 2006, pending USEPA approval. If you have any questions regarding these draft investigation plans, please contact me at (562) 951-2212 or Mr. Paul Sundberg at (209) 474-3617.

Sincerely,

EARTH TECH, INC.

Brian Dean
Senior Project Manager



cc: Mr. John Dolegowski – CH2MHILL, Santa Ana, CA
Mr. Joe Kelly – Montrose Chemical Corp., Bainbridge Island, WA
Mr. Karl Lytz – Latham & Watkins, San Francisco, CA
Mr. Kelly Richardson – Latham & Watkins, San Diego, CA
Mr. Paul Sundberg – Stockton, CA

